

ATTACHMENT A

## RESPONSE

complaints relating to Islyn Palmer. If they exist, they will be produced to plaintiff.

## RESPONSE

# PRODUCTION OF DOCUMENTS

**DEFENDANT'S RESPONSE TO PLAINTIFF'S SECOND REQUEST FOR**

EQUAL EMPLOYMENT OPPORTUNITY  
COMMISSION,  
Plaintiff,  
v.  
NABSTAR, LLC d/b/a SLEEP INN  
Defendant,

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Civil Action No. 05-CV-0374 (GMS)

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

DATED: March 20, 2006

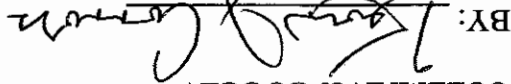
Attorney for Defendant, Nabstar, LLC, d/b/a Sleep Inn  
Wilmington, DE 19899-8888

P.O. Box 8888

1220 North Market Street, 5<sup>th</sup> Fl.

DE Bar ID: 2135

KEVIN J. CONNORS, ESQ.

BY: 

COLEMAN & GOGGIN

MARSHALL, DENNEHEY, WARNER,

cards, thereby rendering this request to produce moot.

its prior discovery responses to withdraw the referenced two (2) written customer comment not apply to the August 2003 time period when Islyn Palmer worked. Defendant is amending were previously produced in error to plaintiff by defendant because those comment cards did understands that the subject request to produce is based upon customer comment cards which reasonable calculated to lead to the discovery of admissible evidence. Defendant

which are irrelevant to the subject matter of the pending litigation and which are not Defendant objects to this request to produce on the grounds that it seeks documents

### RESPONSE

2004 that is in the custody, control or possession of Defendant.

guests of Sleep Inn in Newark, Delaware for the week of August 1, 2004 to August 8, guests, including but not limited to the names, addresses, and telephone numbers of all

3. Produce any and all business records that reflect a full and complete list of registered

defined by plaintiff and defendant is therefore unable to respond.

to produce seeks the production of "other relevant documents" inasmuch as that phrase is not and is also not limited to a reasonable time period. Objection further to the extent this request burdensome inasmuch as it seeks documents related to employees other than Islyn Palmer

reasonably calculated to lead to the discovery of admissible evidence and is overly broad and